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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

SHARON BARNUM, JERRY P. CABEBE,
ROBERT SUSTRIK, and all similarly situated
individuals,

Plaintiffs,

vs.

EQUIFAX INFORMATION SERVICES, LLC,

Defendant.

Case No. 2:16-cv-02866-RFB-NJK

**STIPULATION TO EXTEND
DISCOVERY DEADLINES**

[FOURTH REQUEST]

Pursuant to Fed. R. Civ. P. 26(f), and Local Rule 26-1, Plaintiffs SHARON BARNUM and ROBERT SUSTRIK (“Plaintiffs”), Defendant EQUIFAX INFORMATION SERVICES, LLC (“Equifax”); (together with Plaintiff, the “Parties”), by and through their attorneys, hereby stipulate to extend discovery deadlines and other deadlines in the February 16, 2018 Scheduling Order as follows:

1 **1. Initial Disclosures.**

2 The parties do not propose any changes to the form of disclosures required pursuant to
3 Federal Rule 26(a). The Parties already served their initial disclosures.

4 **2. Completed Discovery.**

5 This is the fourth stipulation to extend discovery deadlines. The stipulation is filed in good
6 faith and is not intended to cause delay.

- 7 1. On February 28, 2017, the Court entered its Initial Scheduling Order and Protective
8 Order.¹ The Scheduling Order set discovery to close on August 7, 2017.²
- 9 2. On May 22, 2017, the Court granted the parties first stipulation to extend discovery 90
10 days.³
- 11 3. Between May 30, 2017 and October 20, 2017, the Parties engaged in extensive
12 discovery, including exchanging written discovery responses, producing documents, and
13 taking depositions of Plaintiffs.
- 14 4. On October 20, 2017, the Court granted a 60-day extension of discovery, setting the close
15 of discovery at January 8, 2018.
- 16 5. Between October 20, 2017 and the present, Plaintiffs deposed two Rule 30(b)(6)
17 witnesses of Equifax and served additional written discovery, to which Equifax timely
18 responded. The Parties also engaged in extensive discussions regarding outstanding
19 discovery issues.
- 20 6. On December 21, 2017, the Court entered a Scheduling Order setting discovery to close
21 on April 23, 2018.
- 22 7. On January 19, 2018, in accordance with the Court's instructions, the Parties filed a Joint
23 Statement.
- 24 8. On February 16, 2018 the Court entered a Scheduling Order⁴ setting certain deadlines,
25 *inter alia*, Initial Expert Disclosures and Interim Status Report to be due April 23, 2018.

26
27 ¹ ECF Nos. 19 & 21, respectively.

28 ² ECF Dkt. No. 10 at 2.

³ ECF Dkt. No. 31 (entering Stipulation to Extend, ECF. No 30).

⁴ ECF Dkt. No. 103.

9. On March 9, 2018, the Court issued an Order on the Joint Statement.

10. On March 13, 2018, Plaintiffs served Equifax with their First Supplemental Requests for Admission and Second Supplemental Interrogatories and Requests for Production.

11. The parties stipulate that Equifax may have a one-week extension to respond to Plaintiffs' First Supplemental Requests for Admission and Second Supplemental Interrogatories and Requests for Production, to be due on April 19, 2018.

12. The parties stipulate to a one-week extension on the deadline for Initial Expert Disclosures and Interim Status Report to April 30, 2018.

13. All other deadlines in the February 16, 2018 Scheduling Order would remain unchanged.

3. Remaining Discovery.

The Parties are requesting the extension on the above deadlines in order to gather additional information necessary for the case.

4. Reason Why Discovery Has Not Been Completed.

Fact discovery does not end until June 22, 2018 and is therefore ongoing.

5. Current Discovery Deadlines.

- Discovery Cutoff: June 22, 2018
- Initial Expert Disclosures and Interim Status Report: April 23, 2018
- Rebuttal Expert Disclosures: May 23, 2018
- Dispositive Motions and Motion for Class Certification and Appointment of Class Counsel: on or before July 23, 2018.
- Joint Proposed Pretrial Order: August 21, 2018
- Responses to Dispositive Motions and Motion for Class Certification and Appointment of Class Counsel: on or before August 21, 2018
- Replies in Support of Dispositive Motions and Motion for Class Certification and Appointment of Class Counsel: on or before September 21, 2018

6. Proposed Discovery Deadlines.

WHEREAS, no prejudice will occur to this Court or the Parties if granted, good cause supports this request to extend discovery;

NOW, THEREFORE, in consideration of the foregoing, and for good cause, IT IS
HEREBY STIPULATED AND AGREED, by and between the Parties as follows:

The February 16, 2018 Scheduling Order shall be amended as follows:

- Discovery Cutoff: **June 22, 2018**
 - Equifax's Responses and Objections to Plaintiffs' First Supplemental Requests for Admission and Second Supplement Interrogatories and Requests for Production: **April 19, 2018**
- Initial Expert Disclosures and Interim Status Report: **April 30, 2018**
- Rebuttal Expert Disclosures: **May 23, 2018**
- Dispositive Motions and Motion for Class Certification and Appointment of Class Counsel: on or before **July 23, 2018**
- Joint Proposed Pretrial Order: **August 21, 2018**
- Responses to Dispositive Motions and Motion for Class Certification and Appointment of Class Counsel: on or before **August 21, 2018**
- Replies in Support of Dispositive Motions and Motion for Class Certification and Appointment of Class Counsel: on or before **September 21, 2018**

IT IS SO STIPULATED.

Respectfully submitted, this 12th day of April, 2018.

/s/ Matthew I. Knepper

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*Attorneys for Defendant Equifax Information
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ORDER GRANTING STIPULATION TO EXTEND DISCOVERY DEADLINES

IT IS SO ORDERED:


UNITED STATES MAGISTRATE JUDGE

DATED: April 12, 2018

4830-0697-6073.1